

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

AUGUST WILDMAN, *et al.*,

Plaintiffs,

-v.-

DEUTSCHE BANK
AKTIENGESELLSCHAFT, *et al.*,

Defendants.

No. 1:21-CV-04400 (KAM) (RML)

**STANDARD CHARTERED DEFENDANTS’
NOTICE OF MOTION TO DISMISS THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE that Defendants Standard Chartered Bank, Standard Chartered PLC, and Standard Chartered Bank (Pakistan) Limited respectfully will move this Court, before the Honorable Kiyo A. Matsumoto, at the U.S. District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, on a date and time designated by the Court, for an order dismissing the Amended Complaint (the “Complaint”) in its entirety, with prejudice, (i) pursuant to Federal Rule of Civil Procedure 8(a), because Plaintiffs fail to set forth a short and plain statement of their claim; (ii) pursuant to Federal Rule of Civil Procedure 12(b)(6), because the Complaint fails to state a claim upon which relief can be granted; and (iii) pursuant to Federal Rule of Civil Procedure 12(b)(2), because the Complaint fails to sufficiently allege personal jurisdiction over Standard Chartered PLC and Standard Chartered Bank (Pakistan) Limited.

The motion is supported by the accompanying Standard Chartered Defendants' Memorandum in Support of Their Motion To Dismiss, dated March 18, 2022, the Declaration of Andrew J. Finn, dated March 18, 2022, the exhibits accompanying the Declaration, and the proceedings to date in this action.

Dated: New York, New York
March 18, 2022

Respectfully submitted,

/s/ Andrew J. Finn

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